

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

DIANA JORDAN

CASE

PLAINTIFF

VS

COMPLAINT

DISTRICT 5 FOUNDATION

FOR EDUCATIONAL EXCELLENCE

DEFENDANT

Plaintiff Diana Jordan brings forth the following causes of action and alleges:

- 1) After becoming aware the District 5 Foundation for Educational Excellence (Foundation) had 2015 flood repair funds available, on 11/11/18 Plaintiff Diana Jordan submitted a basic needs fund application with the Foundation for roof repair. The application was accepted and the roof was repaired, confirming flood funding money.
- 2) The damaged roof allowed water into the attic which destroyed the heat pump coil. Three Rivers Baptist Church (TRBC) facilitated a discounted repair rate of \$750.00 and the church would pay \$500.00 of the cost. On 3/18/18 I submitted another application with the Foundation for the additional \$250.00. The application was rejected and Plaintiff was told the funds would be used for teachers, students and other members of the community. Flood funding has to be used to repair damage caused by the storm, not for school or community projects.
- 3) This case qualifies for federal jurisdiction because both Lexington and Richland Counties received 2015

(8)

Federal flood recovery funds which were administered by the Foundation through social workers at the public schools.

Wherefore Plaintiff Diana Jordan seeks a forensic accounting from 2015 to present by law enforcement if necessary via the Freedom of Information Act to determine if Plaintiff should have received the \$250.00 in March of 2018, which would now be ~~\$1,150.00 DAP~~, \$750.00 to repair the HVAC because the \$500.00 from TRBC is no longer available, plus \$400.00 court costs.

Dated 3/11/19

Diana B. Jordan

DIANA JORDAN

104 WOODGLEN LANE

CHAPIN, SC 29036

Interrogatories:

- A) There is no subrogated interest.
- B) A jury trial is requested.
- C) Both Plaintiff and Defendant are in Richland County, South Carolina.
- D) This case is related to case #3:18-cv-02924-JFA-SVH where Plaintiff neglected to request court costs of \$400.00 in the pleadings.